

**HOLLEY, DRIGGS, WALCH, FINE,  
WRAY, PUZEY & THOMPSON**  
MICHAEL R. AYERS, ESQ.  
800 S. Meadows Parkway, Suite 800  
Reno, Nevada 89521  
Telephone: 775/851-8700  
Facsimile: 775/851-7681

*Attorneys for Defendant NAVIENT SOLUTIONS, LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

SYLVIA QUINN,

Plaintiff,

v.

NAVIENT SOLUTIONS, INC.,

Defendant.

Case No. 2:18-cv-01794-JAD-CWH

**JOINT STIPULATION AND ORDER  
EXTENDING DEADLINE FOR NAVIENT  
SOLUTIONS, INC., TO FILE AN  
ANSWER OR OTHERWISE RESPOND  
TO PLAINTIFF'S COMPLAINT**

**(FIRST REQUEST)**

Plaintiff SYLVIA QUINN ("Plaintiff") and Defendant NAVIENT SOLUTIONS, LLC f/k/a NAVIENT SOLUTIONS, INC. ("NSL"), by and through their respective counsel, stipulate and agree to extend the deadline from September 11, 2018 to September 29, 2018, for Defendant NSL to File an Answer or Otherwise Respond to Plaintiff's Complaint (ECF No. 1.).

On September 17, 2018, Plaintiff filed her Complaint. The claims at issue necessitate additional time for fact-finding. Further, NSL is in the process of acquiring and reviewing all relevant documents so that it can meaningfully respond to the specific allegations contained in Plaintiff's Complaint. Moreover, undersigned counsel was just retained by NSL to defend it in this action, and therefore requires additional time to investigate the allegations and claims asserted against NSL. Plaintiff has no opposition to NSL's request for an extension until September 29, 2018 to file an answer or otherwise respond to Plaintiff's Complaint.

1 This is the first stipulation for extension of time for NSL to respond to Plaintiff's Complaint  
2 and is being made in good faith and not for purposes of undue delay. No additional requests for  
3 extensions are contemplated.

4 **IT IS SO STIPULATED.**

5 Dated this 10th day of October 2018.

6 **HOLLEY, DRIGGS, WALCH, FINE,**  
7 **WRAY, PUZEY & THOMPSON**

8 /s/ Michael R. Ayers

9 JAMES W. PUZEY, ESQ.

10 MICHAEL R. AYERS, ESQ.

11 JOHN SAVAGE, ESQ.

800 S. Meadows Parkway, Suite 800

Reno, Nevada 89521

*Attorneys for Defendant NAVIENT SOLUTIONS, LLC*

12 Dated this 10th day of October 2018.

13 **HAINES & KRIEGER, LLC**

14 /s/ David H. Krieger

15 DAVID H. KRIEGER, ESQ.

16 8985 S. Eastern Avenue, Suite 350

Henderson, NV 89123

*Attorneys for Plaintiff*

17  
18 **ORDER**

19 The Joint Stipulation for Extending Deadline for NSL to file an answer or otherwise  
20 respond up to and including October 29, 2018 is so ORDERED AND ADJUDGED.

21 Dated this 11th day of October, 2018.

22   
23 UNITED STATES MAGISTRATE JUDGE

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10th day of October, 2018, I served a copy of the foregoing  
**STIPULATION AND ORDER EXTENDING DEADLINE FOR NAVIENT SOLUTIONS, INC., TO FILE AN ANSWER OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT** upon the party below via electronic service through the United States District Court for the District of Nevada’s ECF system:

David H. Krieger, Esq.  
HAINES & KLRIEGER, LLC  
8985 S. Eastern Avenue, Suite 350  
Henderson, NV 89123  
Attorney for Plaintiff

By: /s/ SUSAN M. MATEJKO  
An Employee of Holley Driggs Walch Fine Wray  
Puzey & Thompson